

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES  
LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard  
L. Madoff Investment Securities LLC,

Plaintiff,

v.

JAMES B. PINTO REVOCABLE TRUST U/A  
DTD 12/1/03; and JAMES B. PINTO, individually  
and in his capacity as Grantor and Trustee for the  
James B. Pinto Revocable Trust,

Defendants.

Adv. Pro. No. 10-04538 (SMB)

**NOTICE OF RESIGNATION OF CO-COUNSEL AND PROPOSED ORDER**

The law firm of Marvin C. Ingber, Attorney and Counselor at Law, 6705 Apace Road, Edina, MN 55439-1001, having appeared as attorney of record for James B. Pinto Revocable Trust U/A DTD 12/1/03 and James B. Pinto (the “Defendants”) in this adversary proceeding hereby resigns as co-counsel of record and the law firm of Frejka PLLC, 205 East 42<sup>nd</sup> Street – 20<sup>th</sup> Floor, New York, New York 10017, shall continue and become the sole attorney of record for the Defendants in this adversary proceeding. All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

FREJKA PLLC  
205 East 42<sup>nd</sup> Street – 20<sup>th</sup> Floor  
New York, New York 10017  
Attn: Elise S. Frejka  
Jason S. Rappaport  
Telephone: (212) 641-0800  
Email: efrejka@frejka.com  
jrappaport@frejka.com

Defendants have knowledge of and consent to the resignation of Marvin C. Ingber,  
Attorney and Counselor at Law, as co-counsel.

Dated: Palm Springs, California  
December 14, 2016

Dated: New York, New York  
January 3, 2017

Marvin C. Ingber

FREJKA PLLC

By: /s/ Marvin C. Ingber  
Marvin C. Ingber  
6705 Apache Road  
Edina, MN 55439-1001  
Telephone: (612) 327-8378  
Fax: (952) 941-3652

By: /s/ Elise S. Frejka  
Elise S. Frejka  
Jason S. Rappaport  
205 East 42<sup>nd</sup> Street – 20<sup>th</sup> Floor  
New York, New York 10017  
Telephone: (212) 641-0800  
Fax: (212) 641-0200

Dated: New York, New York  
January \_\_, 2017

SO ORDERED:

HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE